IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,)	
)	
v.)	Case No. 1:14-CR-39
)	
CRAIG STANFORD EURY, JR.,)	
)	

MOTION FOR EXTENSION OF TIME TO FILE POSITION OF THE PARTIES WITH RESPECT TO SENTENCING FACTORS

Defendant Craig Stanford Eury, Jr., by and through counsel, respectfully moves the Court to extend his time to file the Position of Parties with Respect to Sentencing Factors in this matter by one week, until September 17, 2015. In support of this Motion, Mr. Eury shows to the Court that:

- (1) The draft presentence report in this matter was filed on August 20, 2015.
- (2) Mr. Eury submitted his objections to the draft presentence report to the United States Probation Office on September 3, 2015, and filed them with the Court on September 4, 2015. The government also filed its objections to the draft presentence report on September 4, 2015.
- (3) Counsel for Mr. Eury is in an ongoing dialogue with both the attorneys for the government and the United States Probation Office regarding the application of the Sentencing Guidelines in this matter, and believes these conversations may narrow the range of issues for the Court's determination at the September 24, 2015 sentencing hearing.
- (4) As such, counsel for Mr. Eury respectfully requests an extension of the deadline for filing his Position of Parties with Respect to Sentencing Factors.

(5) Counsel for Mr. Eury has communicated by e-mail with the government's attorney, who expressed that he does not object to the requested extension. The Unites States Probation Officer assigned to this matter also expressed no objection to the Court

granting the additional time.

WHEREFORE, without objection, Mr. Eury respectfully requests that the deadline to file Position of Parties with Respect to Sentencing Factors be extended by one week, until Thursday, September 17, 2015.

This the 10th day of September, 2015.

/s/ Wes J. Camden

Kearns Davis N.C. State Bar No. 22014 kdavis@brookspierce.com

Wes J. Camden N. C. State Bar No. 33190 wcamden@brookspierce.com

Brooks, Pierce, McLendon, Humphrey, & Leonard, L.L.P. P. O. Box 26000 Greensboro, NC 27420-6000 (336) 373-8850

Fax: (336) 378-1001

Counsel for Defendant Craig Stanford Eury, Jr.

CERTIFICATE OF SERVICE

I hereby certify that, on the date below, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Frank Chut, Esq.

This the 10th day of September, 2015.

/s/ Wes J. Camden

Wes J. Camden